

Eve H. Cervantez (SBN 164709)
ecervantez@altshulerberzon.com

Connie K. Chan (SBN 284230)
cchan@altshulerberzon.com

ALTSHULER BERZON LLP

177 Post Street, Suite 300

San Francisco, CA 94108

Telephone: (415) 421-7151

Facsimile: (415) 362-8064

Stephen R. Bassar (SBN 121590)

sbassar@barrack.com

Samuel M. Ward (SBN 216562)

sward@barrack.com

BARRACK RODOS & BACINE

One America Plaza

600 West Broadway, Suite 900

San Diego, CA 92101

Telephone: (619) 230-0800

Facsimile: (619) 230-1874

Additional Counsel on Signature Page

Attorneys for Plaintiff C.P.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE META PIXEL TAX FILING CASES

Master File No. 3:22-cv-07557-SI

This Document Relates to:

**NOTICE OF RELATED CASE
PURSUANT TO THE COURT'S ORDER
OF FEBRUARY 9, 2023**

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 Pursuant to this Court's Order of February 9, 2023 (Dkt. No. 30), Plaintiff C.P.
3 ("Plaintiff") respectfully submits this Notice of Related Case. As set forth below, *C.P. v. Meta*
4 *Platforms, Inc.*, Case No. 3:23-cv-00735, (filed February 17, 2023) (the "*C.P. Action*") should,
5 consistent with the Court's Order of February 9, 2023, be related to and consolidated with a
6 consolidated action, *In re Meta Pixel Tax Filing Cases*, Master File No. 3:22-cv-007557-SI (the
7 "*Meta Pixel Tax Filing Action*"), pending before this Court.¹

8 Pursuant to Local Rule 3-12(a), cases are related where "(1) [t]he actions concern
9 substantially the same parties, property, transaction or event; and (2) [i]t appears likely that there
10 will be an unduly burdensome duplication of labor and expense or conflicting results if the cases
11 are conducted before different [j]udges." Plaintiff states that the *C.P. Action* involves the same
12 Defendant as the *Meta Pixel Tax Filing Action*; both the *C.P. Action* and the *Meta Pixel Tax*
13 *Filing Action* are class actions; and the *C.P. Action* arises from the same transaction or event
14 alleged in the *Meta Pixel Tax Filing Action*, namely the collection of sensitive taxpayer data
15 through the use of the Facebook Pixel, a piece of computer code designed to track consumer use
16 and interactions with the websites of online tax filing service providers.

17 Pursuant to Local Rule 3-12(a)(2), it appears likely that there will be an unduly
18 burdensome duplication of labor and expense or the possibility of conflicting results if the cases
19 are conducted before different Judges.

20 ///

21 ///

22 ///

23 ///

24 ///

25
26
27
28 ¹ On February 9, 2023, this Court entered an order relating and consolidating several cases into the above-captioned action: *John Doe, et al. v. Meta Platforms, Inc.*, Case No. 3:22-CV-07557-SI, filed December 1, 2022; *Katrina Calderon, et al. v. Meta Platforms, Inc.*, Case No. 5:22-cv-09149-SI, filed December 29, 2022; and *Craig v. Meta Platforms, Inc.*, Case No. 3:23-cv-00315-TLT, filed January 23, 2023. Dkt. No. 30.

1 In light of the above, Plaintiff C.P. respectfully requests that the *C.P.* Action be related to
2 and consolidated with the Meta Pixel Tax Filing Action and assigned to the Honorable Susan
3 Illston. Parties to the Meta Pixel Tax Filing Action do not object to the relation and consolidation
4 of the *C.P.* Action with the Meta Pixel Tax Filing Action.

5
6 Dated: February 28, 2023

Respectfully submitted,

7 /s/ Samuel M. Ward

8 Samuel M. Ward

9 Stephen R. Basser (121590)

10 sbasser@barrack.com

Samuel M. Ward (216562)

11 sward@barrack.com

BARRACK, RODOS & BACINE

12 600 West Broadway, Suite 900

San Diego, CA 92101

13 Telephone: (619) 230-0800

14 Facsimile: (619) 230-1874

15 Eve H. Cervantez (SBN 164709)

16 ecervantez@altshulerberzon.com

Connie K. Chan (SBN 284230)

17 cchan@altshulerberzon.com

ALTSHULER BERZON LLP

18 177 Post Street, Suite 300

San Francisco, CA 94108

19 Telephone: (415) 421-7151

20 Facsimile: (415) 362-8064

21 John G. Emerson*

jemerson@emersonfirm.com

EMERSON FIRM, PLLC

22 2500 Wilcrest Drive, Suite 300

23 Houston, TX 77042

24 Telephone: (800) 551-8649

Facsimile: (501) 286-4659

25 * Application for admission *Pro Hac Vice*
26 forthcoming

27 *Attorneys for Plaintiff C.P.*
28

CERTIFICATE OF SERVICE

In re Meta Pixel Tax Filing Cases
Master File No. 3:22-cv-07557-SI

I, the undersigned, state that I am employed in the City and County of San Diego, State of California; that I am over the age of eighteen (18) years and not a party to the within action; that I am employed at Barrack, Rodos & Bacine, 600 West Broadway, Suite 900, San Diego, California 92101; and that on February 28, 2023, I served a true copy of the attached:

**NOTICE OF RELATED CASE PURSUANT TO THE COURT'S ORDER OF
FEBRUARY 9, 2023**

to the identified below by the following means of service:

☒ **BY E-FILE:** I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses of all counsel registered to receive e-filings in this action.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 23rd day of February, 2023.

/s/ Samuel M. Ward
SAMUEL M. WARD